



Control Number: 48785



Item Number: 118

Addendum StartPage: 0

**SOAH DOCKET NO. 473-19-1265
PUC DOCKET NO. 48785**

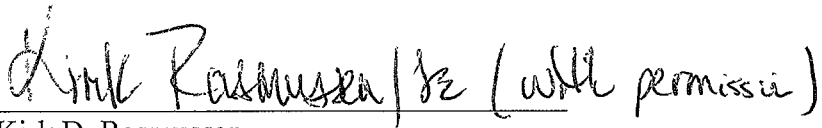
JOINT APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC, AEP TEXAS INC., AND LCRA TRANSMISSION SERVICES CORPORATION TO AMEND THEIR CERTIFICATES OF CONVENIENCE AND NECESSITY FOR 345-KV TRANSMISSION LINES IN PECOS, REEVES, AND WARD COUNTIES, TEXAS (SAND LAKE TO SOLSTICE AND BAKERSFIELD TO SOLSTICE)	§ § § § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
RESPONSE TO ATMOS ENERGY CORPORATION'S FIRST REQUEST FOR
INFORMATION**

COMES NOW LCRA Transmission Services Corporation (LCRA TSC) and AEP Texas, Inc. (AEP Texas) and files this Response to Atmos Energy Corporation's (Atmos Energy) First Request for Information (RFI). By agreement with Atmos Energy, this Response is timely filed. LCRA TSC and AEP Texas agree and stipulate that all parties may treat these responses as if the answers were filed under oath.

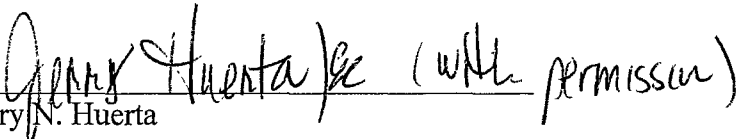
Respectfully submitted,

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**ATTORNEYS FOR LCRA TRANSMISSION
SERVICES CORPORATION**

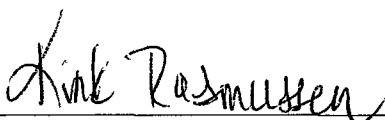

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ATTORNEYS FOR AEP TEXAS, INC.

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on this date, January 30, 2019, in accordance with 16 TAC § 22.74.


Kirk D. Rasmussen

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
RESPONSE TO ATMOS ENERGY CORPORATION'S FIRST REQUEST FOR
INFORMATION**

AEP Texas Question No. 1-1:

Please provide a complete copy of LCRA TSC and AEP's Joint Application.

AEP Texas Response No. 1-1:

Application provided.

Co-Prepared By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Prepared By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC
Co-Sponsored By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Sponsored By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
RESPONSE TO ATMOS ENERGY CORPORATION'S FIRST REQUEST FOR
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LCRA TSC Question No. 1-1/AEP Texas Question 1-2:

Identify all segments of the proposed transmission line that are located within 500 feet of an APT metallic pipeline and provide the distance in feet between each segment and the pipeline or facility. Provide all available data to support your response.

LCRA TSC Response No. 1-1/AEP Texas Response 1-2:

Please see the below table for the approximate distances from the centerline of the delineated primary segments and APT pipelines (as such ownership and location is known to LCRA TSC and AEP Texas) within 500 feet. In some areas, the pipeline continues to approximately parallel beyond 500 feet. Supporting data has been available to the requesting party.

Primary Segment	Diameter of APT Pipeline	APT Pipeline Crossings	Range of Approximate Distance to APT Pipeline When Parallel and Adjacent (feet)
N	18"	1	0*
Q	18"	1	0*
Q	4.5"	1	0*
R	18"	1	0*
U	18"	1	0*
P1	18"	1	350-500+
Q1	18"	0	300-500***
R1	18"	1	0*

R1	4.5"	1	0*
T1	18"	0	**
A2	18"	1	0*

**APT pipeline crossing, not parallel*

*** APT pipeline within 500 feet, but not parallel*

****APT pipeline paralleled for approximately 500 feet*

Co-Prepared By: Sonya Strambler
Co-Prepared By: Lisa Barko Meaux

Title: Regulatory Case Manager, LCRA
Title: Project Manager, POWER Engineers, Inc.

Co-Sponsored By: Sonya Strambler
Co-Sponsored By: Lisa Barko Meaux

Title: Regulatory Case Manager, LCRA
Title: Project Manager, POWER Engineers, Inc.

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
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LCRA TSC Question No. 1-2/AEP Texas Question 1-3:

Indicate whether LCRA TSC or AEP Texas will own the proposed facilities that will be located on any of the routes within 500 feet of an APT metallic pipeline.

LCRA TSC Response No. 1-2/AEP Texas Response 1-3:

For all the routing segments as identified in the response to LCRA TSC Question No. 1-1 and AEP Texas Question No. 1-2 that will either parallel within 500 feet or cross an APT metallic pipeline, it will be AEP Texas owning the proposed facilities at those locations.

Co-Prepared By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Prepared By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC
Co-Sponsored By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Sponsored By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
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LCRA TSC Question No. 1-3/AEP Texas Question 1-4:

Indicate when LCRA TSC and AEP Texas intend to begin operating their proposed line as a double-circuit line, if an approximate date is known at this time.

LCRA TSC Response No. 1-3/AEP Texas Response 1-4:

As provided in response to CCN Application Question No. 8, the current estimated energization date of both circuits of the proposed transmission line is December 2020.

Co-Prepared By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Prepared By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC
Co-Sponsored By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Sponsored By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC

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LCRA TSC Question No. 1-4/AEP Texas Question 1-5:

Identify any anticipated operating parameters to be used to operate the proposed transmission line that are not already identified in the application in this proceeding, including but not limited to anticipated current load, anticipated maximum current load, and any anticipated fluctuations in maximum current load and the reasons for those fluctuations.

LCRA TSC Response No. 1-4/AEP Texas Response 1-5:

The proposed transmission line has the potential to be operated up to its maximum facility rating, as identified in the application, in the course of normal transmission operation activities. Loading levels vary hourly, daily, and seasonally. Factors that may influence the loading level of the proposed transmission line include but are not limited to outage events, generation dispatch levels, end-user load requirements, and system topology changes (many of which are outside of LCRA TSC's and AEP Texas' control).

Prepared By: Curtis Symank
Sponsored By: Curtis Symank

Title: Senior Project Manager, POWER Engineers, Inc.
Title: Senior Project Manager, POWER Engineers, Inc.

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
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LCRA TSC Question No. 1-5/AEP Texas Question No. 1-6:

Regarding page 2-5, Row 18 and Table 4-1, line 18 of the Environmental Assessment, define the phrase "parallel and adjacent" and explain the rationale behind the definition and how it was applied in performing the analyses supporting this chart.

LCRA TSC Response No. 1-5/AEP Texas Response No. 1-6:

In accordance with the Commission's rules and precedent, LCRA TSC, AEP Texas, and POWER did not consider pipeline rights-of-way (ROW) to be existing compatible ROW. For this reason, the lengths tabulated in line 18 in Table 4-1 of the Environmental Assessment do not specifically include paralleling of pipeline ROW. "Parallel" means equally distant from and not meeting, and "adjacent" means nearby or having a common border. Line 18 of Table 4-1 of the Environmental Assessment identifies the length of routes that are parallel and adjacent to pipelines six inches and greater carrying petrochemicals, to the extent the Commission determines such information is relevant to its evaluation of alternative routes.

Prepared By: Lisa Barko Meaux
Sponsored By: Lisa Barko Meaux

Title: Project Manager, POWER Engineers, Inc.
Title: Project Manager, POWER Engineers, Inc.

**JOINT APPLICATION OF ONCOR
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**BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS**

LCRA TSC Question No. 1-6/AEP Texas Question No. 1-7:

LCRA TSC Response No. 1-6/AEP Texas Response No. 1-7:

10

Petrochemicals are defined as chemicals obtained from petroleum and natural gas. Accordingly, the information in the Environmental Assessment is intended to include pipelines that carry natural gas.

There are no documents responsive to this request.

Prepared By: Lisa Barko Meaux
Sponsored By: Lisa Barko Meaux

Title: Project Manager, POWER Engineers, Inc.
Title: Project Manager, POWER Engineers, Inc.

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
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LCRA TSC Question No. 1-7/AEP Texas Question No. 1-8:

Regarding Table 4-1, line 18 of the Environmental Assessment, confirm whether all lengths of segments or routes that are located within 500 feet of an APT metallic natural gas pipeline are included in the calculation of these criteria. Describe the analyses undertaken to confirm that all such pipelines were identified and explain why any specific pipelines or types of pipelines were excluded.

LCRA TSC Response No. 1-7/AEP Texas Response No. 1-8:

Table 4-1 includes pipelines 6 inches or greater reflected in Pennwell and Railroad Commission of Texas data. Please refer to the response to LCRA TSC Question No. 1-6/AEP Texas Question No. 1-7, which provides an explanation of the identification of pipelines and the inclusion in Table 4-1.

Prepared By: Lisa Barko Meaux
Sponsored By: Lisa Barko Meaux

Title: Project Manager, POWER Engineers, Inc.
Title: Project Manager, POWER Engineers, Inc.

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
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LCRA TSC Question No. 1-8/AEP Texas Question No. 1-9:

Regarding Table 4-1, line 19 of the Environmental Assessment, confirm whether all lengths of segments or routes that are located within 500 feet of an APT metallic natural gas pipeline are included in the calculation of these criteria. Describe the analyses undertaken to confirm that all such pipelines were identified and explain why any specific pipelines or types of pipelines were excluded.

LCRA TSC Response No. 1-8/AEP Texas Response No. 1-9:

Table 4-1 includes pipelines 6 inches or greater reflected in Pennwell and Railroad Commission of Texas data.

Prepared By: Lisa Barko Meaux
Sponsored By: Lisa Barko Meaux

Title: Project Manager, POWER Engineers, Inc.
Title: Project Manager, POWER Engineers, Inc.

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LCRA TSC Question No. 1-9/AEP Texas Question No. 1-10:

Regarding page 11 of the direct testimony of Curtis Symank, is LCRA TSC or AEP Texas willing to make routing adjustments to avoid above-ground Atmos Energy facilities by a minimum of 150 feet?

LCRA TSC Response No. 1-9/AEP Texas Response No. 1-10:

AEP Texas and LCRA TSC will work with pipelines and other petroleum facilities as provided for by the Final Order and will use good utility practices and comply with applicable laws and regulations.

Prepared By: Curtis Symank
Sponsored By: Curtis Symank

Title: Senior Project Manager, POWER Engineers, Inc.
Title: Senior Project Manager, POWER Engineers, Inc.

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
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LCRA TSC Question No. 1-10/AEP Texas Question No. 1-11:

Refer to the direct testimony of Mr. Symank at page 5. What specific steel pole or H-frame based designs may be required because of adjacent pipeline crossings?

LCRA TSC Response No. 1-10/AEP Texas Response No. 1-11:

No site-specific structures have been identified and designed at this stage of the project for specific adjacent pipelines or pipeline crossings. Based on experience there may be locations along the ordered route that are either beyond the standard structure design capabilities or simply require customization, such as a span over other transmission lines, highways, pipelines, or combinations of these other installations. This effort and determination will be part of detailed design of the ordered route.

Prepared By: Curtis Symank
Sponsored By: Curtis Symank

Title: Senior Project Manager, POWER Engineers, Inc.
Title: Senior Project Manager, POWER Engineers, Inc.

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LCRA TSC Question No. 1-11/AEP Texas Question No. 1-12:

Refer to the direct testimony of Mr. Symank on page 13, lines 4-7. If the Commission does not order any coordination between LCRA TSC, AEP Texas and pipeline companies, what coordination, if any, would LCRA TSC and AEP Texas attempt with pipeline companies before energizing the line?

LCRA TSC Response No. 1-11/AEP Texas Response No. 1-12:

Consistent with their standard practices, LCRA TSC and AEP Texas will use good utility practices and comply with applicable laws and regulations.

Co-Prepared By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Prepared By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC
Co-Prepared By: Curtis Symank	Title: Senior Project Manager, POWER Engineers, Inc.
Co-Sponsored By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Sponsored By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC
Co-Sponsored By: Curtis Symank	Title: Senior Project Manager, POWER Engineers, Inc.

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
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LCRA TSC Question No. 1-12/AEP Texas Question No. 1-13:

Does LCRA TSC/AEP Texas dispute that electric transmission lines can cause induced current on natural gas steel pipelines absent sufficient mitigation measures?

LCRA TSC Response No. 1-12/AEP Texas Response No. 1-13:

LCRA TSC and AEP Texas do not dispute that transmission lines may cause induced current on natural gas steel pipelines absent sufficient mitigation measures being installed on the pipeline by the pipeline operator.

Prepared By: Curtis Symank
Sponsored By: Curtis Symank

Title: Senior Project Manager, POWER Engineers, Inc.
Title: Senior Project Manager, POWER Engineers, Inc.

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC.'S
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LCRA TSC Question No. 1-13/AEP Texas Question No. 1-14:

Indicate whether LCRA TSC's and AEP Texas's estimated costs for each proposed transmission line route in this project include costs associated with mitigating the impacts of the proposed line on existing natural gas pipelines. If LCRA TSC's and AEP Texas's proposed costs include any such costs, either specifically or as a component of any overage estimates, please provide the basis for such costs and any documents that support those cost estimates.

LCRA TSC Response No. 1-13/AEP Texas Response No. 1-14:

With respect to pipeline crossings, \$15,000 per apparent pipeline crossing was included as a construction adder for crossings identified based on information available at the time. This input was applied on a per segment basis as a minor construction cost adder for estimating purposes.

LCRA TSC and AEP Texas are not aware of a need or an obligation to pay for any AC mitigation associated with the potential impacts of this project on natural gas pipelines, and have not made any such payment for AC mitigation to a pipeline owner or operator in connection with a prior transmission line project. The estimated costs for this project do not include potential costs associated with AC mitigation for pipelines. In the event LCRA TSC and AEP Texas are required by an appropriate regulatory body to pay for appropriate mitigation associated with established impacts of the proposed transmission line on natural gas pipelines, they will do so.

There are no documents responsive to this request.

Prepared By: Curtis Symank
Sponsored By: Curtis Symank

Title: Senior Project Manager, POWER Engineers, Inc.
Title: Senior Project Manager, POWER Engineers, Inc.

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LCRA TSC Question No. 1-14/AEP Texas Question No. 1-15:

Pursuant to Texas Health & Safety Code §§ 756.121-.126, does LCRA TSC or AEP Texas intend to pursue a written agreement with Atmos Energy to construct LCRA TSC's and AEP Texas's joint proposed transmission line project across Atmos Energy's easements? If not, please explain.

LCRA TSC Response No. 1-14/AEP Texas Response No. 1-15:

As noted on page 8 of Curtis Symank's Direct Testimony, LCRA TSC and AEP Texas intend to construct and operate the project in a manner that complies with applicable state statutes and regulations. It is both common practice and the intention of LCRA TSC and AEP Texas to establish agreements with directly affected parties, when appropriate, that further define the requirements for construction and operations for each crossing.

Prepared By: Curtis Symank	Title: Senior Project Manager, POWER Engineers, Inc.
Co-Sponsored By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Sponsored By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC
Co-Sponsored By: Curtis Symank	Title: Senior Project Manager, POWER Engineers, Inc.

**SOAH DOCKET NO. 473-19-1265
PUC DOCKET NO. 48785**

JOINT APPLICATION OF ONCOR	§	
ELECTRIC DELIVERY COMPANY LLC,	§	
AEP TEXAS INC., AND LCRA	§	
TRANSMISSION SERVICES	§	BEFORE THE STATE OFFICE
CORPORATION TO AMEND THEIR	§	
CERTIFICATES OF CONVENIENCE	§	OF
AND NECESSITY FOR 345-KV	§	
TRANSMISSION LINES IN PECOS,	§	ADMINISTRATIVE HEARINGS
REEVES, AND WARD COUNTIES,	§	
TEXAS (SAND LAKE TO SOLSTICE	§	
AND BAKERSFIELD TO SOLSTICE)	§	

**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
RESPONSE TO ATMOS ENERGY CORPORATION'S FIRST REQUEST FOR
INFORMATION**

LCRA TSC Question No. 1-15/AEP Texas Question No. 1-16:

Confirm whether LCRA TSC and AEP Texas support adopting in the final order in this proceeding the following final ordering language: "LCRA TSC and AEP Texas shall coordinate with pipeline owners or operators in the vicinity of the approved route regarding the pipeline owners or operators assessment of the need to install measures to mitigate the effects of AC interference on existing natural gas pipelines that are crossed or paralleled by the proposed electric transmission facilities." If not, please explain in detail the basis and indicate what ordering language LCRA TSC and AEP Texas will support with regards to metallic pipelines that could be affected by the transmission line.

LCRA TSC Response No. 1-15/AEP Texas Response No. 1-16:

LCRA TSC and AEP Texas will comply with the Commission's final order, including any ordering language directing LCRA TSC and AEP Texas to cooperate with pipeline owners.

Co-Prepared By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Prepared By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC
Co-Sponsored By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Sponsored By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC

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**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC'S
RESPONSE TO ATMOS ENERGY CORPORATION'S FIRST REQUEST FOR
INFORMATION**

LCRA TSC Question No. 1-16/AEP Texas Question No. 1-17:

Confirm whether LCRA TSC and AEP Texas support adopting in the final order in this proceeding the following final ordering language: "LCRA TSC and AEP Texas shall conduct surveys to identify pipelines that could be affected by the proposed transmission line, if not already completed, and coordinate with pipeline owners in modeling and analyzing potential hazards because of AC interference affecting pipelines being crossed or paralleled." If not, please explain in detail the basis and indicate what ordering language LCRA TSC and AEP Texas will support with regards to metallic pipelines that could be affected by the transmission line.

LCRA TSC Response No. 1-16/AEP Texas Response No. 1-17:

LCRA TSC and AEP Texas will comply with the Commission's final order, including any ordering language directing LCRA TSC and AEP Texas to cooperate with pipeline owners.

Co-Prepared By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Prepared By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC
Co-Sponsored By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Sponsored By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC

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TEXAS (SAND LAKE TO SOLSTICE	§	
AND BAKERSFIELD TO SOLSTICE)	§	

**LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS, INC.'S
RESPONSE TO ATMOS ENERGY CORPORATION'S FIRST REQUEST FOR
INFORMATION**

LCRA TSC Question No. 1-17/AEP Texas Question No. 1-18:

Confirm whether LCRA TSC and AEP Texas support adopting in the final order in this proceeding the following final ordering language: "LCRA TSC and AEP Texas must coordinate with Atmos Energy (1) regarding any facilities routed within 150 feet from Atmos Energy's above ground facilities to avoid the risk of an electric arc or spark igniting the vented gas and to avoid a risk of toppling; (2) before conducting any blasting within 300 feet of Atmos Energy's pipelines to avoid damaging them; and (3) before operating any heavy construction equipment across existing Atmos Energy pipeline ROW." If not, please explain in detail the basis and indicate what ordering language LCRA TSC and AEP Texas will support with regards to metallic pipelines that could be affected by the transmission line.

LCRA TSC Response No. 1-17/AEP Texas Response No. 1-18:

LCRA TSC and AEP Texas will comply with the Commission's final order, including any ordering language directing LCRA TSC and AEP Texas to cooperate with pipeline owners.

Co-Prepared By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Prepared By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC
Co-Sponsored By: Sonya Strambler	Title: Regulatory Case Manager, LCRA
Co-Sponsored By: Brent Harris	Title: Transmission Project Manager Principal, AEPSC